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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUSAN YATES,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:21-cv-01511-DJA

**MOTION FOR EXTENSION OF TIME TO FILE
ANSWER AND ELECTRONIC COPY OF
CERTIFIED ADMINISTRATIVE RECORD**

(FIRST REQUEST)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by and
 2 through her undersigned attorneys, hereby moves for an extension of time to file the answer and certified
 3 administrative record (CAR) in this case, which are currently due on June 27, 2022. The CAR in this case
 4 has been prepared, and in anticipation of the current deadline in this case, the Commissioner filed a motion
 5 to be relieved of the CD copy of the CAR, which the Court granted (Dkt. Nos. 11, 12). However, as the
 6 Commissioner attempted to prepare the CAR for e-filing and printing, the undersigned observed a technical
 7 issue that currently prevents the agency from printing the paper CAR due to errors that pop up. The
 8 undersigned believes this issue will also cause difficulties with filing the eCAR on CM/ECF.

9 Accordingly, the Commissioner seeks a 21-day extension of time to resolve this technical issue so
 10 the CAR can be printed and the eCAR can be filed with this Court. The agency has multiple IT personnel
 11 working on this issue, but this issue is unusual and requires time to diagnose and resolve. The
 12 Commissioner apologizes to Plaintiff and the Court for the inconvenience, but believes the issue can be
 13 resolved within 21 days. On June 21, 2022, the undersigned conferred with Plaintiff’s counsel about this
 14 extension request, and counsel does not object to the requested extension.

15 For these reasons, the Commissioner respectfully requests that the Court grant this motion and
 16 allow the Commissioner to file her answer and eCAR by July 18, 2022. The Commissioner will also
 17 provide the Court with the paper copy on this date.

18 Dated: June 22, 2022

Respectfully submitted,

19 JASON M. FRIERSON
 20 United States Attorney

21 /s/ Allison J. Cheung
 22 ALLISON J. CHEUNG
 Special Assistant United States Attorney

23 IT IS SO ORDERED:

24 
 25 UNITED STATES MAGISTRATE JUDGE

26 DATED: June 23, 2022

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of the foregoing **MOTION FOR EXTENSION OF TIME TO FILE ANSWER AND ELECTRONIC COPY OF CERTIFIED ADMINISTRATIVE RECORD** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Cyrus Safa
cyrus.safa@rohlflinglaw.com
Attorney for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 22, 2022

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney